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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 NAVAJO HEALTH FOUNDATION – SAGE
19 MEMORIAL HOSPITAL, INC. (doing
business as “Sage Memorial Hospital”); an
20 Arizona non-profit corporation,

21 Plaintiff,

Case No. 2:19-cv-0329-GMN-EJY

22 vs.

23 RAZAGHI DEVELOPMENT COMPANY,
24 LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
25 AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO RESPOND TO
DEFENDANTS’ MOTION TO DISMISS
(FIRST REQUEST)**

27 Defendants.
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1 Pursuant to Federal Rule of Civil Procedure 6 and the Court's Local Rule of Civil
2 Practice 7-1, the parties hereby stipulate, subject to the Court's approval, to permit Plaintiff
3 additional time, to and until November 1, 2021, to respond to Defendant's motion to dismiss
4 which was previously filed on August 23, 2021 (ECF No. 147). Presently, Plaintiff's response
5 is due today, September 23, 2021. This is Plaintiff's first request for an extension of time for
6 the reasons cited herein.

7 In support of this Stipulation, the parties agree to the following:

8 1. Good cause exists to support this request for additional time. Plaintiff's counsel
9 represent they have been working diligently on a response to the pending dispositive motion but
10 due to recent circumstances will not be able to timely complete a response. Specifically, during
11 the past 2-weeks, both Kathleen Bliss, Esq. and Douglass Mitchell, Esq. have experienced
12 significant issues related to the health and well-being of family members that has required their
13 attention. Additionally, Paul S. Padda, Esq. who has also been working on the response, has
14 been required to prepare for a trial expected to commence next month in state court.

15 2. Counsel for the respective parties have discussed this request for extension and agree
16 that an extension of time to and until November 1, 2021 is appropriate under the circumstances.
17 The parties further agree that Defendants shall have 30-days following Plaintiff's filing of a
18 response within which time to file a reply.

19 The parties respectfully request the Court approve this Stipulation.

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21 /s/ Kris Leonhardt

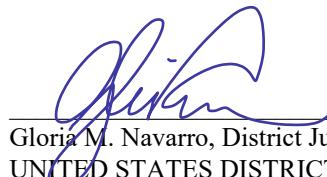
22 Pavneet S. Uppal, Esq.
23 Kris Leonhardt, Esq.
24 Brian L. Bradford, Esq

25 *Counsel for all named Defendants*

26 Dated: September 23, 2021

27 **IT IS SO ORDERED.**

28 Dated this 24 day of September, 2021


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

1 **IT IS SO ORDERED:**
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UNITED STATES MAGISTRATE JUDGE

DATED: _____